

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Interconnection Between Local Exchange Carriers)
and Commercial Mobile Radio Service Providers)

CC Docket No. 95-185

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COMMENTS OF U S WEST, INC.

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March 4, 1996

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Introduction and Summary of U S WEST's Comments

U S WEST welcomes this rulemaking and commends the Commission for commencing it. Given recent revolutionary developments in the telecommunications industry, it is time to re-evaluate current interconnection pricing. However, the need is to reform all interconnection and access pricing — LEC-IXC, LEC-CMRS, LEC-LEC (new and neighboring), and LEC-ISP — not simply LEC-CMRS interconnection. The Commission should, therefore, consolidate this proceeding into the new local interconnection rulemaking it will commence next month to implement the Telecommunications Act of 1996.¹ This proceeding, in turn, should be considered in tandem with the access reform rulemaking the Commission also announced it will commence “in the near future” because the issues of local interconnection and access “are closely related.”²

The most important objectives of the comprehensive local interconnection proceeding should be to:

- Reaffirm the principle that interconnection pricing should move away from who uses the network toward how a network is used;
- Reaffirm the fact that all carriers realize significant value by connecting to the public switched network;
- Reaffirm that, at least in the first instance, interconnection arrangements among co-carriers (including pricing) should be negotiated in good faith; and

¹Draft Federal Communications Commission Implementation Schedule for S. 652, “Telecommunications Act of 1996,” Feb. 12, 1996, at 1.

² See Notice at 9 ¶ 17 and 37 ¶ 77.

- Reaffirm the statutory mandate that mutual compensation is required for the exchange of all traffic among co-carriers, unless carriers choose voluntarily to waive this right by adopting other arrangements (such as “bill and keep”).

LEC interconnection/access pricing today consists of a hodgepodge of prices and price structures. The current pricing regime is premised on the proposition that there are discrete industry segments, each providing separate (or at least separable) services: local telephone service, long distance telephone service, mobile communications service, information (or enhanced) service, and entertainment services.

This Commission, at critical junctures in the industry’s development, has developed different interconnection/access policies for each particular industry segment — even though the use of the LEC network was in some cases similar, if not identical. For example, access charges for IXC’s were set well above cost to subsidize residential local exchange service; information service providers (“ISPs”) were exempted from access charges to stimulate development of that “infant” industry; LECs and CMRS providers were told to negotiate their local interconnection arrangements. In each case there were valid policy arguments in support of the Commission’s decisions at the time they were made.

This hodgepodge of interconnection/access prices and policies is no longer sustainable because of profound changes in the industry. Industry segments are rapidly converging, as most starkly evidenced by cable TV companies providing telecommunications services and LECs providing video services — as U S WEST firms are now doing. This convergence is further confirmed by IXC entry into local markets (both landline and

wireless) and also by Bell entry into new wireless markets (both in- and out-of-region). Virtually every carrier is examining ways to provide information and entertainment services as well.

This convergence is fueled by developments in technology and by economic and market forces.³ However, this convergence will now be accelerated by the recent enactment of the Telecommunications Act of 1996. This Act removes many of the legal barriers that were already under challenge by technological, economic, and market forces. Collectively, these forces are fueling the creation of “a network of networks” in which consumers will enjoy a vast array of robust choices.

The current LEC interconnection and access pricing structure cannot be sustained in this environment. Take AT&T as an example. Is the traffic a LEC receives from AT&T an interexchange call (subject to one call termination price), a CMRS call (subject to another price), a local landline call (subject to yet another price), or an ISP call (for which no usage charge is imposed at all)? Or take MFS, which is beginning to connect a wide variety of other networks to U S WEST’s LEC network. Is the traffic U S WEST’s

³ Once all information can be converted to “0s” and “1s”, a carrier can transport all types of traffic over the same wireline or wireless pipe: voice, data, video, text, facsimile; soon, carriers will be able to transport all types of traffic over the same switch.

Economic forces likewise have facilitated this convergence. Networks are expensive to build and maintain, and sizable economies of scale and scope can be realized by consolidating traffic, regardless of type, on as few facilities as possible.

But the principal force driving this convergence is the desire of carriers to meet the demand of their customers for “one-stop shopping” — the ability to buy at one place of mixture of different services. Consumers have clearly voiced their need for simplicity and flexibility.

LEC receives from MFS an interexchange call (subject to one call termination price), a CMRS call (subject to another price), a local landline call (subject to yet another price), or an ISP call (for which no usage charge is imposed at all)? Is the traffic U S WEST's LEC delivers to MFS a call on which mutual compensation is required?

The Commission is absolutely correct in noting that "substantially different prices for similar forms of interconnection raise the possibility that parties could seek to deflect traffic from a more costly form of interconnection to a less costly form."⁴ Arbitrage is not just a possibility, it is a reality: all carriers must constantly strive to reduce their costs to improve their competitive stature. The further reality is that, unless separate trunk groups are used for different types of traffic, no carrier has the ability to determine whether its network is being used for one type of traffic as opposed to another.

Reform of LEC interconnection and access pricing is necessary to send the correct economic signals to market participants and to allow interconnectors to achieve economies of scale (*e.g.*, using one interconnection pipe rather than multiple pipes for different types of traffic). This reform will facilitate further growth in the converged telecommunications market and, most importantly, will allow market forces to decide the sets of technologies and services needed to meet consumer demand.

However, reform is also necessary to ensure that LECs can continue to meet their universal service obligations and can continue to serve, at least in the near future, as the

⁴ Notice at 37 ¶ 77.

backbone for the new “network of networks.” LECs will be unable to provide the glue holding together the “network of networks” unless investor expectations can be satisfied. These expectations require a rational interconnection and access pricing structure and a reasonable opportunity to earn a return on investments, both past and future.

These objectives can be met only if interconnection and access prices are based on how the LEC network is used. The Commission, once again, is absolutely correct in observing that “functionally equivalent services — including services related to network interconnection — should be available . . . at the same prices.”⁵ Achieving this goal — similar price structures for similar network uses — should be the Commission’s highest priority. A truly level competitive playing field will not be established until this goal is realized.

Congress has now made clear that carrier-to-carrier interconnection are to be addressed by private negotiations. However, Congress has first charged this Commission with developing a governing framework for local interconnection requirements — and it has directed this Commission to complete this framework by August 8, 1996.

Given the challenge facing the Commission and the tight time frames under which it must act, U S WEST is surprised by the proposal to adopt an “interim” plan for one industry segment: LEC-CMRS interconnection. This proposal is a surprise because it is not apparent what benefits would be achieved by adopting in June a radically new “interim”

⁵ Notice at 4 ¶ 4. See also *id.* at 9-10 ¶ 17.

plan for one industry segment (*i.e.*, CMRS) when broader interconnection arrangements applicable to all local telecommunications carriers (including CMRS) must be developed by August 8, 1996.

Such a haphazard approach to interconnection will not achieve the stated goal of giving CMRS providers "some degree of certainty."⁶ The fact is that, between now and August, no carrier (including new entrants) will be deprived of needed interconnection; existing arrangements — *albeit* certainly imperfect — can be (and have been) used for the short period until a new overall framework is developed.⁷ Besides, existing LEC-CMRS arrangements were negotiated in good faith and, according to the CMRS industry, these negotiations have resulted in "satisfactory interconnection agreements."⁸

Finally, the proposed interim plan is a surprise because it would depart from, rather than promote, the Commission's objective of having similar prices for similar uses of the LEC network and because it would depart radically from its long-standing policy of cost-based pricing. As noted, the current patchwork quilt of interconnection/access policies must be replaced by a single, coherent policy. This is certainly not the time to add one more patch to the quilt by developing yet another interconnection policy for one particular industry segment, CMRS.

⁶ Notice at 28 ¶ 58.

⁷ For example, U S WEST's LEC has already executed interconnection contracts with PCS licensees, giving these licensees the same prices, terms, and conditions available to incumbent cellular carriers.

⁸ CTIA Comments, Docket 94-54, at 18 and 20 (Sept. 12, 1994).

Instead, the Commission should seize this opportunity and political impetus for change to develop a rational interconnection/access policy that will serve as the essential ingredient in ensuring competition among, yet the interoperability of, the “network of networks.” If such an integrated interconnection/access policy treats carriers or services differently, it should be based on actual economic or technical differences in the type of interconnection services employed, rather than as a matter of historical accident.

U S WEST’s CMRS ventures obviously would prefer, even if only for an interim period, to obtain free interconnection from LECs — including from U S WEST LECs. But now is not the time to depart from sound economic principles by favoring one industry segment over another and creating a new, special class of interconnectors. The public interest is served by the adoption of rational pricing rules — not by exacerbating class of carrier specific rules in need of reform. Given the tight Congressional mandate, this Commission should focus its finite resources on developing a rational and economically-based framework that will benefit all telecommunications carriers — incumbents and new entrants, landline and wireless alike — so this nation can achieve new heights as it enters the next century.

Simply put, what is needed is a transition plan, not an interim plan. But to develop a transition plan, both the Commission and the industry need to know the end game.

U S WEST demonstrates in Section I that there is no need to adopt an interim plan because current LEC-CMRS interconnection arrangements have not been viewed as un-

reasonable. This view is shared by virtually all participants in the current arrangements. As one major CMRS association stated only 18 months ago, “[m]ost LECs and cellular carriers. . . find that the [current] process generally produces fair and nondiscriminatory ~~inter~~connection arrangements.”⁹ As it further advised the Commission:

When considering how best to ensure fair and efficient interconnection arrangements between LECs and CMRS providers, the Commission should be guided by the old adage, ‘if it ain’t broke, don’t fix it.’¹⁰

What is more, current CMRS interconnection charges are not a barrier to increased local competition; U S WEST documents that its Type 2 interconnection charges represent less than 3% of a CMRS provider’s total revenues.

In Section II, U S WEST demonstrates that, even if it were appropriate to adopt an interim plan, “bill and keep” is not the right plan. “Bill and keep” would represent poor economics and even poorer public policy. Mandatory “bill and keep” would be flatly inconsistent with the new Telecommunications Act, and it would also infringe upon LECs’ constitutional rights protecting them from the confiscation of their property.

In Section III, U S WEST sets forth the some of the policies that should govern interconnection pricing in the new “network of networks” environment. In Section IV, U S WEST demonstrates that the Commission’s questions regarding jurisdiction/preemption and the procedures governing LEC-CMRS interconnection have now

⁹ CTIA Comments, Docket 94-54, at 18 and 20 (Sept. 12, 1994).

¹⁰ CTIA Reply Comments, Docket 94-54, at 9 (Oct. 13, 1994).

been addressed in the Telecommunications Act of 1996. Finally, U S WEST demonstrates in Section V that regulatory intervention into CMRS-IXC interconnection is unnecessary.

U S WEST appends two attachments. The first is a paper prepared by Dr. Robert G. Harris, an economics professor at the University of California's business school and principal in the Law & Economics Consulting Group. Dr. Harris documents that "Dr. Brock's papers contain fatal flaws in logic, misrepresentations of the positions of other economists and misstatements of fact regarding interconnection arrangements" and that, as a result, this Commission "should not rely on either Dr. Brock's conclusions or the premises on which they are based."¹¹ Dr. Harris further explains that "bill and keep: violates the central tenet of economics — that prices play a critically important role in the allocation and distribution of goods and services in a market economy.

The second attachment is a paper summarizing the Internet and the economics of interconnection within the Internet. This paper also documents that Mr. Brock is wrong in asserting that commercial Internet service providers interconnect for free. To the contrary, the Internet utilizes asymmetrical compensation arrangements in which smaller networks pay larger networks for the privilege of connecting to larger networks: "Money flows upwards: Each level pays the next for connectivity and, occasionally usage."¹²

¹¹ Attachment A at 2.

¹² Kenneth Hart, "Internet Providers Want Body to Manage Growth," Communications Week International (Sept. 1, 1995).

Thus, to the extent the Commission “adopt[s] policies that are intended to create or replicate market-based incentives,”¹³ the Internet example suggests it should adopt asymmetrical compensation arrangements whereby smaller carriers pay larger carriers for interconnection.”

The Internet example reflects the elementary economic fact that smaller carriers receive more value by connecting to large carriers than *vice versa*. This example further confirms that the existing public switched network has tremendous value to all providers of telecommunications services. Very simply, new providers in particular would not have a business were it not for access to the public switched network. Given this fact, LEC interconnection charges should be set such that an interconnector pays its fair share for use of this ubiquitous network; under no circumstances should an interconnector pay less than that paid by a LEC’s own retail service subscribers.

Ultimately, what is needed is a rational (and therefore sustainable) pricing structure for LEC retail services and LEC interconnection charges which treats all network usage and capacity demands the same way — thereby avoiding the inherent potentials for arbitrage and uneconomic bypass that plague the industry today. However, until LECs are given a reasonable opportunity to recover their embedded costs and until they are given the flexibility to re-balance their rates for local residential service, a transition plan is needed. And given the value they receive by accessing the public switched network,

¹³ Notice at 4 ¶ 4.

all telecommunications carriers — and especially CMRS providers which impose “a significant premium” for their own retail services and which earn “economic rents of significant proportions”¹⁴ — must participate in this transition plan.

As stated above, the current patchwork quilt of interconnection/access policies must be replaced by a new single, coherent policy. This is certainly not the time to add one more patch to the quilt by developing yet another interconnection policy for one particular industry segment.

¹⁴ Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, First Report, 10 FCC Rcd 8844, 8869 ¶ 75 and 8871 ¶ 81 (Aug. 18, 1995).

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Appendix

- A A Response to Dr. Gerald Brock, by Professor Robert G. Harris, Walter A. Haas School of Business, University of California, Berkeley, and Principal, Law & Economics Consulting Group

- B The Internet: A Case Study of Interconnection Pricing in a Nonregulated Competitive Market

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U S WEST COMMENTS

U S WEST, Inc. submits these comments in response to the Notice of Proposed Rulemaking, FCC 95-505 (Jan. 11, 1996) (“Notice”) and the Supplemental Notice of Proposed Rulemaking, FCC 96-61 (Feb. 16, 1996) (“Supplemental Notice”). U S WEST owns numerous subsidiaries and partnership interests which provide a wide array of telecommunications, entertainment, and information services — using both wireline and wireless technologies.

**I. THERE IS NO NEED FOR AN INTERIM PLAN BECAUSE
U S WEST’S CMRS INTERCONNECTION ARRANGEMENTS
ARE REASONABLE**

The Commission has “tentatively conclude[d] that an interim pricing approach should be adopted” for LEC-CMRS interconnection.¹ It reached this conclusion based on its belief that current interconnection arrangements are unreasonable and/or that there exists a “possibility” that LECs might “stymie the ability of CMRS providers to interconnect”:

¹ Notice at 28 ¶ 59.

We tentatively conclude that it will better serve the public interest to give providers some degree of certainty, within a short time, that reasonable interconnection arrangements will be available.²

Notably absent from these tentative findings is any evidence that current interconnection arrangements are unreasonable or that, after over a decade of interconnection, LECs will suddenly begin “stymieing” the ability of CMRS providers to interconnect. Instead, the Commission relies entirely on certain CMRS providers’ recent *ex parte* assertions — all of which are undocumented.

The picture painted by certain CMRS providers in recent months is very different than the picture they painted only months earlier. A year or so ago, the CMRS industry advised the Commission that LEC-CMRS interconnection arrangements were “working satisfactorily,”³ that they have “enjoyed favorable results overall negotiating interconnection agreements with LECs,”⁴ and that “[f]avorable rates are currently obtainable.”⁵ As one CMRS association put it:

When considering how best to ensure fair and efficient interconnection arrangements between LECs and CMRS providers, the Commission should be guided by the old adage, “if it ain’t broke, don’t fix it.”⁶

² *Id.* at 28 ¶ 58.

³ AT&T Comments, Docket No. 94-54, Summary at ii (Sept. 12, 1994). *See also* McCaw Comments, Docket No. 94-54, at 24 n.58 (Sept. 12, 1994) (“LECs and cellular carriers . . . have indicated that they are satisfied with the current system.”).

⁴ OneComm Comments, Docket No. 94-54, at 20 (Sept. 12, 1994).

⁵ Western Wireless Comments, Docket No. 94-54, at 21 (Sept. 12, 1994).

⁶ CTIA Reply, Docket No. 94-54, at 9 (Oct. 13, 1994).

In this section, U S WEST demonstrates that the most recent claims of certain CMRS providers are not simply undocumented, but are, in fact, wrong. While the Commission does, indeed, need to re-examine current rate structures so prices are based on how the LEC network is used, rather than on who is using the network (*e.g.*, CMRS vs. IXC vs. LEC vs. ESP), there is no need to adopt an interim plan for CMRS which would change radically interconnection arrangements that the CMRS industry has negotiated in good faith and has acknowledged are "fair and nondiscriminatory."⁷

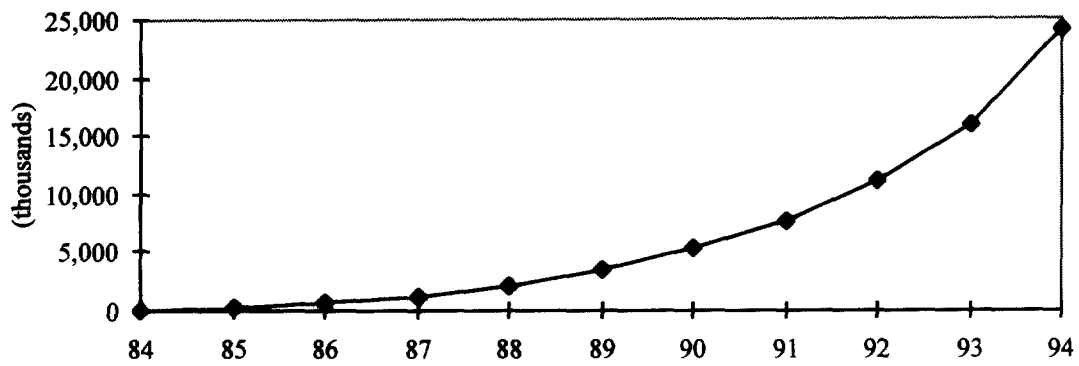
A. The Claim That Current Interconnection Arrangements Are Unreasonable Is Itself Unreasonable On Its Face

The undocumented assertion by certain CMRS providers that current LEC interconnection arrangements are unreasonable is belied by all objective facts. The Commission is well aware of the phenomenal growth of the cellular industry:⁸

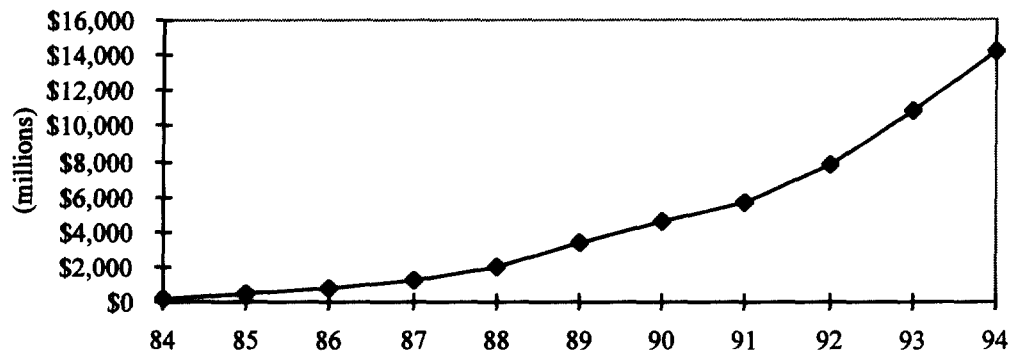
⁷ CTIA Comments, Docket No. 94-54, at 18 (Sept. 12, 1994).

⁸ The following three tables use data compiled by CTIA. *See generally* Table 1, "Cellular Growth," Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Radio Services, 10 FCC Rcd 8844, 8874 (Aug. 18, 1995).

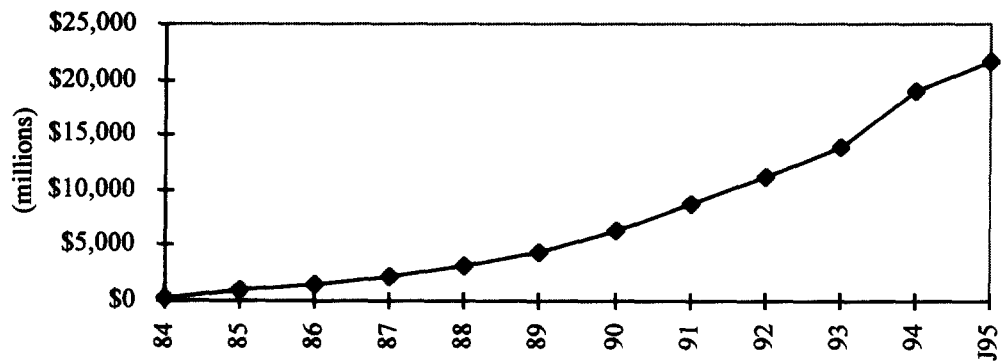
Cellular Subscribers (000)



Cellular Revenues (000,000)



Cumulative Cellular Capital Investment (000,000)



Clearly, the cellular industry would not have enjoyed this growth in customers and revenues, or made this huge capital investment, had LEC interconnection arrangements and prices been unreasonable. It is understandable why the cellular industry describes itself as the "American Success Story."⁹

Companies are also paying enormous sums simply to enter the CMRS market. In 1994 AT&T spent approximately \$16 billion (including debt assumption) to acquire McCaw. Last year, 18 firms paid \$7.7 billion to acquire A and B block PCS licenses for the right to compete against cellular carriers, and a wholly different set of entrepreneurs has currently bid \$7 billion to acquire a C block license alone. These sums would not have been paid if LEC interconnection arrangements were unreasonable or if there was a fear that LECs would begin "stymieing" CMRS interconnection.

Indeed, these sums were paid with the full understanding that current LEC interconnection arrangements would remain in effect. At the time of the A and B block PCS auctions, it was understood by all — those who participated and those who chose not to participate — that licensees would continue to pay for LEC-CMRS interconnection as had been done in the past. The auction participants even included the costs of Type 2 interconnection as part of their calculation of the net present value of a PCS license. Reducing interconnection cost to zero by using "bill and keep" would represent a transfer of wealth both from LECs to PCS licensees and from the U.S. Treasury to PCS licensees,

⁹ Ibid.

who would surely have bid more money for PCS licenses if they had known they would get free interconnection.

Clearly, LEC-CMRS interconnection prices are not a deterrent to either new licensees wanting to enter the CMRS market or existing CMRS licensees wanting to continue to earn "economic rents of significant proportions."¹⁰

B. The Negotiated LEC-CMRS Interconnection Process Has Worked Well and Has Admittedly Produced "Fair and Non-discriminatory" Agreements

Largely due to the Commission's directive, LECs have utilized a very different process for CMRS interconnection (good faith negotiations) than that employed with other interconnectors (tariffs). Incumbent CMRS providers who have participated in and benefited by these negotiations have almost uniformly recognized that this good faith process has "produce[d] fair and nondiscriminatory interconnection arrangements":

Cellular companies and LECs have negotiated and implemented satisfactory interconnection agreements.¹¹

U S WEST demonstrates below that, as a result of this good faith negotiation process, (1) its interconnection charges are reasonable and have been declining, (2) it has customized the terms and conditions of interconnection to meet the specific needs of the

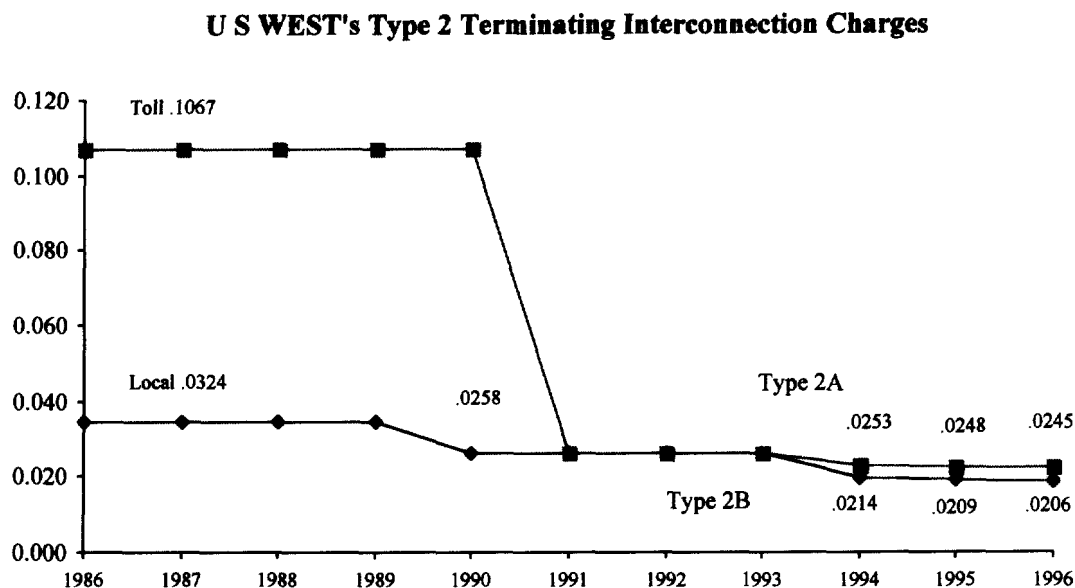
¹⁰ See Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, 10 FCC Rcd 8844, 8871 ¶ 81 (Aug. 18, 1995).

¹¹ CTIA Comments, Docket No. 94-54, at 18 and 20 (Sept. 12, 1994).

CMRS industry, and (3) it has introduced new service offerings that have helped fuel the growth of the CMRS industry.

1. U S WEST's CMRS Interconnection Charges Are Reasonable and Have Been Declining

As one large CMRS provider advised the Commission only months ago, "LEC interconnection charges . . . are gradually decreasing."¹² This is certainly true of U S WEST's CMRS interconnection rates, as the following chart demonstrates:



As explained more fully below, U S WEST's current rates are available to all mobile services providers — CMRS or PMRS, large or small, incumbent or new entrant.

¹² AirTouch Comments, Docket No. 94-54, Summary at iii (June 14, 1995). See also *id.* at 7 (AirTouch has seen "steadily declining interconnection charges . . . in the contracts it has negotiated.").

What is more, and in response to a need identified during the last round of negotiations, U S WEST currently offers a growth discount plan which further stimulates CMRS usage. Under this discount plan, which again is available to all CMRS providers, large or small (including new entrants), CMRS providers are charged discounted Type 2 usage rates. In addition, CMRS providers can receive a refund each year, the size of which is based upon their past year's total recurring billing growth:

<u>If CMRS total recurring billing grows at least . . .</u>	<u>they receive a refund on their year's terminating interconnection charges of . . .</u>
22%	2.0%
27%	4.0%
32%	5.5%
37%	7.0%
42%	8.5%
47% or more	10.0%

Because of this growth discount plan, U S WEST in 1995 charged CMRS providers effective rates of 1.91¢ (\$0.0191) per minute for Type 2B interconnection and 2.26¢ (\$0.0226) per minute for Type 2A interconnection. These sums are less than half those charged to interexchange carriers to terminate intrastate toll traffic.¹³

Clearly, U S WEST's CMRS terminating interconnection charges are reasonable and, just as clearly, those charges have been "steadily declining."¹⁴

¹³ U S WEST's average intrastate IXC access charge for both originating and terminating access is \$0.0442 per minute.

¹⁴ AirTouch Comments, Docket No. 94-54, at 7 (June 14, 1995).

2. Negotiations Have Allowed U S WEST to Customize Its Type 2 Offerings to Meet the Specific Needs of CMRS Providers

The structure of U S WEST's Type 2 interconnection offerings has changed dramatically over the years. These changes were made as a direct result of the negotiation process and as a direct result of requests of CMRS providers. As one prominent CMRS provider advised the Commission recently, "Pursuant to 'good faith negotiations,' cellular carriers have negotiated contracts for the particular type, location, timing, and prices for interconnection that meet the needs of their particular system":

Through negotiations, wireless carriers can obtain precisely the functions they need, including the physical point of demarcation, transport and switching elements, intercept announcements, and billing and collection services. The result is a wide range of system architectures and more innovative service packages based upon specific [CMRS] customer demands.¹⁵

Major changes were made to U S WEST's original Type 2 offerings as a result of the negotiations conducted during 1990-91. At the request of CMRS providers, U S WEST developed one region-wide Type 2 rate to replace the previous 14 rates (one per state). Again at the request of CMRS providers, U S WEST eliminated the separate rate for terminating toll and local traffic and introduced one blended rate in its stead. U S WEST also introduced Type 2B interconnection to give CMRS providers the flexibility to connect directly to a U S WEST end office (and realize additional cost savings). U S

¹⁵ AirTouch Comments, Docket No. 94-54, at 21 (Sept. 12, 1994). See also McCaw Comments, Docket No. 94-54, at 23 (Sept. 12, 1994) ("The use of contracts permits CMRS providers to seek and obtain interconnection arrangements customized to meet their specific network requirements and business planning needs more easily and efficiently than they could under a tariff regime.").

WEST further modified how it billed for usage — from the next whole minute by call to the next whole minute by total billing period — resulting in further reductions to CMRS usage billing. Of course, as the graph on page 7 demonstrates, basic interconnection charges were also reduced.

Yet more changes were made to U S WEST's Type 2 offerings as a result of the negotiations conducted during 1993-94. At the request of CMRS providers, U S WEST eliminated distance sensitive MOU mileage bands and replaced them with postalized MOU rates for all CMRS traffic within a LATA. U S WEST introduced a Type 2B MOU discounted rate as well as its growth discount plan described above. And, of course, basic interconnection charges were reduced yet again.

The good faith negotiation process has resulted in CMRS providers obtaining very favorable terms of interconnection compared to those of interexchange carriers (which purchase interconnection from tariffs). In addition to paying rates only half those charged to IXC's, CMRS providers enjoy the following advantages:

	<u>IXCs</u>	<u>CMRS Providers</u>
Minutes charged	Originating <u>and</u> terminating	Terminating <u>only</u>
Call setup time	Yes	No
Charged usage	All call attempts	Completed calls <u>only</u>
CCL	Yes	No
Connection	Every access tandem in a LATA	Only the tandem serving the CMRS' local calling areas